TRACO™
The Windows And Doors That Greet The World
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Richard H. Karney, P.E., Acting Manager
Energy Star Program
Office of Building Technology Assistance
Building Technology, State and Community Programs

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Gentlemen,

I enjoyed meeting you on March 20th at the Energy Star public hearing in Washington DC. The meeting was great and the interaction essential. I am taking this opportunity to convey TRACO's comments in writing.

TRACO is a manufacturer of commercial and residential windows. It is our understanding that the guidelines for Energy Star pertain strictly to ***residential*** buildings. Nevertheless, we are seeing architects and general contractors referring to the Energy Star guidelines for commercial projects. This is becoming problematic as the two markets are very different. Could the message be reinforced together with a clear definition of what constitutes a "residential" project? I would be grateful if you would send me an official statement clarifying that Energy Star is only targeted at residential products. I intend to share this with our sales force so as to keep educating the A/E/C community.

Secondly, out of all the Energy Star proposals, TRACO supports proposal #5, increasing the Central region U-factor from .4 to .5 and having a minimum SHGC value for the Northern zone. Considering that the average square footage of windows in the Northern region seems lower than that in the Central and Southern regions, the demand for solar energy (UV) and lighting is higher. Therefore the SHGC should be at least .55 or higher. This might also enable enough UV exposure to kill bacteria and contribute to a healthy indoor environment. This phenomenon should be studied in detail however.

The TRACO perspective is that of the overall performance of the product, which is affected by several issues. Air infiltration is a very important factor that can substantially affect the energy performance of the product. Conversely, life cycle analysis of the product might show that performance deteriorates over time: weatherstripping wears and tears, some materials expand and contract, causing leaks and affect the overall energy performance of the home. Issues such as structural loads, sound transmittance and security all play a substantial role in overall performance, not all materials perform equally.

Sincerely,

Mike Manteghi
TRACO Research and Innovation Manager

Cc: Mark Ginsberg
Michael McCaabe
Lee Bodner